

Susan Plank

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March 8, 2011

Science Advisory Board Staff Office
US Environmental Protection Agency
Attn: Edward Hanlon, Designated Federal Officer
email: hanlon.edward@epa.gov
1200 PA Avenue N. W.
Mail Code 1400R
Washington, DC 20460-4164

Attention Edward Hanlon:

Thanks to the EPA for allowing concerned citizens to provide their public comments to the Science Advisory Board regarding the EPA Draft Plan to Study the Potential Impacts of Hydraulic Fracturing on Drinking Water Resources. I just became aware Saturday afternoon, March 5, that the SAB would be reviewing the draft March 7 & 8. I was able to obtain a copy of the 140 page draft yesterday. Today I called the EPA hot line to find out where to send my comments. I was informed that the comments were to be sent in by February 28 with two versions of the documents to be sent; one hard copy with original signature and one hard copy without signature also an electronic copy via email with and without signature (the computer I am using is unable to do electronic signatures). I have attached a copy of the 2011 News Releases stating that "the public will have an opportunity to provide comments to the SAB during their review;" nowhere in that news release does it state the date of the public comment period is before the review. Saturday afternoon, I actually wondered how the SAB would review comments sent in during the two days of their review. Since, I just spent a day and a half trying to get a copy, read it, write a comment and send it, I am sending my letter whether it is past the deadline or not.

Last year on September 20, 2010, I wrote to Jill Dean with the EPA Hydraulic Fracturing Study Committee with my comments to be included on the EPA Hydraulic Fracturing Study. I still have concerns regarding the current unsafe practices gas companies are using in natural gas drilling from Marcellus Shale and as soon as feasible from Oriskany Shale. I am a concerned U.S. citizen and Rockingham County resident (living at a private residence in the George Washington National Forest) in Virginia where hydraulic fracturing has become a very large and controversial issue. In February 2010, the application of Carrizo LLC for a Special Use Permit (entire site lies within a FEMA designated 100 year flood plain) for gas well drilling, completion, stipulation and production on property in Bergton {R. Ennis No. 1 Carrizo (Marcellus) LLC} has caused quite a rift in the peace of the Shenandoah Valley. At this time, according to an article on August 31, 2010 in the Daily News Record, "Energy Company Backs Off Gas Permit," Carrizo LLC is not actively pursuing approval on

their permit. My understanding is that the Rockingham County Board of Supervisors has currently tabled that permit. I have voiced my concerns in writing to the Rockingham County Board of Supervisors. Along with the local government struggle on natural gas drilling, the George Washington & Jefferson National Forest is also concerned with the hydraulic fracturing issue and is revisiting the 1993 Forest Plan. I sent my comments to Karen Overcash, the Planning Team Leader on the GW Plan Revision in the George Washington & Jefferson National Forest during their May 7, 2010 Scoping Period. When their comment period is open in late March or early April, I will be sending my comments.

Since April 8, 2010, I have been researching the natural gas drilling issue because of the special use permit request in my area of Virginia by Carrizo. I was pleased to see that the EPA has a study happening over hydrofracking contamination and that the "FRAC ACT" is revisiting the 2005 Energy Policy Act that tied the hands of the DEQ and gave exemption that allowed natural gas drillers to pollute air and water without restrictions or regulations causing health and environmental hazards. I also believe that the current drilling process for natural gas - hydrofracking - still has potential dangers and can have irreversible impacts on our local land, water and air and from our area have irreversible impacts on to other locales. Even though I feel that landowners should be able to use their land as they choose and believe in our individual rights as U.S. citizens, I feel that a careful responsible balance must be met to not allow that the carrying out of our individual rights potentially and significantly harm other citizens and or our land, water, and air.

With this letter, I would like to thank the EPA for developing the Draft Plan to Study the Potential Impacts of Hydraulic Fracturing on Drinking Water Resources. I understand the necessity of the EPA's current study focus to be narrowed down to the impacts on drinking water resources. I appreciate that the EPA states that additional research areas, like air quality, terrestrial and aquatic ecosystems impacts, public safety concerns, etc. would be beneficial "to provide a holistic view of the impacts of hydraulic fracturing on human health and the environment."

But, I would like to make a few comments regarding this draft. In paragraph one, on page 1, I would like to point out that the Marcellus Shale also runs through part of western Virginia. On page 13, in the 3.5 Regulatory Framework section, this section seems to state the agencies have some control over gas production wells. I was under the impression that in the 2005 Energy Policy Act, the natural gas companies were exempt from following quite a few of those statutes and would only be regulated by the DEQ if contaminations occurred. On page 25, in the 6.2.3 what factors may influence the likelihood of contamination of drinking water resources section, it is not just released fluids, such as spills or leaks that need to be researched; but also storm runoff through these released fluids that "might flow into a nearby surface water body or infiltrate into the soil and near-surface ground water, potentially reaching drinking water aquifers." On page 37, in the 6.4.3 what factors may influence the likelihood of contamination of drinking water resources section and on page 42, in 6.5.3 proposed research activities -wastewater treatment and waste disposal section, needing also to be researched is weather compromising the flowback and produced water collection and storm runoff through these waste impoundment pits and wastewater treatment, including but not limited to evaporation pits (on

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page 44, Table 7. the retrospective case study finalists section seems to address a bit of this). On page 71, Table A2. the proposed research for chemical mixing section concerning how effective are mitigation approaches should also include research on weather and storm runoff.

Thank you for your time and attention regarding this matter. Thank you again for allowing concerned citizens a voice.

Sincerely,

Susan Plank

attachment

EPA: United States Environmental Protection Agency

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2011 News Releases

EPA Submits Draft Hydraulic Fracturing Study Plan to Independent Scientists for Review / The draft plan is open to public comment

Release date: 02/08/2011

Contact Information: Jalil Isa (News Media Only), isa.jalil@epa.gov, 202-564-3226, 202-564-4355

WASHINGTON – The U.S. Environmental Protection Agency (EPA) today submitted its draft study plan on hydraulic fracturing for review to the agency's Science Advisory Board (SAB), a group of independent scientists. Natural gas plays a key role in our nation's clean energy future and the process known as hydraulic fracturing is one way of accessing that vital resource. EPA scientists, under this administration and at the direction of Congress, are undertaking a study of this practice to better understand any potential impacts it may have, including on groundwater. EPA announced its intention to conduct the study in March 2010 and use the best available science, independent sources of information, a transparent, peer-reviewed process and with consultation from others. Since then, EPA has held a series of public meetings across the country with thousands attending and the agency has developed a sound draft plan for moving forward with the study.

The scope of the proposed research includes the full lifespan of water in hydraulic fracturing, from acquisition of the water, through the mixing of chemicals and actual fracturing, to the post-fracturing stage, including the management of flowback and produced or used water and its ultimate treatment and disposal.

The SAB plans to review the draft plan March 7-8, 2011. Consistent with the operating procedures of the SAB, stakeholders and the public will have an opportunity to provide comments to the SAB during their review. The agency will revise the study plan in response to the SAB's comments and promptly begin the study. Initial research results and study findings are expected to be made public by the end of 2012, with the goal of an additional report following further research in 2014.


Hydraulic fracturing is a process in which large volumes of water, sand and chemicals are injected at high pressures to extract oil and natural gas from underground rock formations. The process creates fractures in formations such as shale rock, allowing natural gas or oil to escape into the well and be recovered. Over the past few years, the use of hydraulic fracturing for gas extraction has increased and has expanded over a wider diversity of geographic regions and geologic formations.

For a copy of the draft study plan and additional information: <http://yosemite.epa.gov/sab/sabproduct.nsf/02ed90b136fc21ef85256eba00436459/d3493ab445ae61418525775900603a79!OpenDocument&TableRow=2,1#2>

More information on hydraulic fracturing:
www.epa.gov/hydraulicfracturing

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